

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Cristian De Jesus PEREZ SARGENTO

Case No. Case: 2:25-mj-30012

Assigned To : Unassigned

Assign. Date : 1/17/2025

Description: CMP USA V. PEREZ
SARGENTO (DA)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 14, 2025 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

Code Section

Offense Description

Title 18, United States Code, Section 922(g)(5)(A), Alien in Possession of Firearm
924(a)(8)

This criminal complaint is based on these facts:

On or about January 14, 2025, in the Eastern District of Michigan, Southern Division, Cristian De Jesus PEREZ SARGENTO, a citizen and national of Mexico, knowing that he was an alien illegally and unlawfully in the United States, did knowingly possess a firearm and ammunition, that is a Taurus G3C 9mm firearm, serial number ACB592704 and 12 rounds of 9mm ammunition, which had been shipped and transported in interstate or foreign commerce, in violation of Title 18, USC 922(g)(5) and 924(a)(8).

Continued on the attached sheet.



Brett Laug
Complainant's signature

Brett Laug, Border Patrol Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: January 17, 2025

City and state: Detroit, Michigan



Elizabeth A. Stafford
Judge's signature

Elizabeth A. Stafford, United States Magistrate Judge

Printed name and title

AFFIDAVIT

I, Brett A. Laug, declare the following under penalty of perjury:

1. I am a Border Patrol Agent with the United States Department of Homeland Security, United States Border Patrol. The facts set forth herein are based upon my personal knowledge as well as information provided by other law enforcement officers to include Border Patrol Agents and record checks of law enforcement databases. I have also reviewed the immigration file and system automated data relating to Cristian De Jesus PEREZ SARGENTO. This affidavit is submitted for the limited purpose of establishing probable cause in support of a criminal complaint and arrest warrant for Cristian De Jesus PEREZ SARGENTO, for violation of 18 U.S.C. § 922(g)(5)(A), alien in possession of firearm. I have not included every fact known to law enforcement related to this investigation.
2. On January 14, 2025, Taylor Police Department contacted the Gibraltar Border Patrol Station for help identifying PEREZ SARGENTO, who was the sole occupant of a vehicle stopped for reckless driving southbound on Interstate 75. At the time of his arrest, PEREZ SARGENTO had in his possession a State of California identification card and a Social Security card, which were subsequently determined to be fraudulent. PEREZ SARGENTO's vehicle was towed and impounded.
3. After confirming his illegal status in the United States, PEREZ SARGENTO was surrendered to the Border Patrol Agents, who transported him to the Gibraltar Border Patrol Station for further processing.
4. While at the Gibraltar Border Patrol Station, PEREZ SARGENTO'S fingerprints and photograph were captured and entered into the Automated Biometric Identification System (IDENT) and the Next Generation Identification (NGI). The results revealed that PEREZ SARGENTO is a citizen of Mexico, with no record of legally entering the United States.
5. CBP Anti-Smuggling Unit (ASU) Agents interviewed PEREZ SARGENTO in the Spanish language. PEREZ SARGENTO's was advised of his Miranda rights and agreed to speak with the Agents. PEREZ SARGENTO admitted to entering the United States with the assistance of an unknown smuggler on March 22, 2022. He claimed he paid the smuggler \$7,000. Since that time, he has been residing in Memphis, Tennessee.

6. PEREZ SARGENTO gave the Agents permission to search his cellular telephone. He then voluntarily opened his phone, using facial recognition. Before conducting the search, the Agents asked PEREZ-SARGENTO if there was anything in the phone which could get him in trouble. PEREZ SARGENTO denied the presence of any such evidence.
7. The search of PEREZ SARGENTO'S phone revealed photographs of PEREZ SARGENTO holding what appeared to be an AR-15 type rifle, and another picture of a handgun on a person's lap. At that time, the Agents again advised PEREZ SARGENTO of his Miranda rights and presented him with a form to allow an electronic search of the telephone. The form was written in the Spanish language. PEREZ SARGENTO signed the form, giving his consent.
8. Continuing the interview, PEREZ SARGENTO admitted that the AR-15 type rifle was a real firearm, which he was posing with "because it looked cool." PEREZ SARGENTO also said that he was the person holding the handgun in his lap, and that he got the handgun as a gift from his friend. He said that he thought that it was illegal for him to have a gun. He told the Agents that he could not remember if the gun was in the glove compartment of his car, where he normally keeps it, or at his home.
9. PEREZ SARGENTO gave consent to the Agents to search his car, in a written form which had been read to him in the Spanish language.
10. Border Patrol Agents conducted a search of the vehicle registered and owned by PEREZ SARGENTO. During the search, in the vehicle glove compartment, the Agents found a Black Taurus Handgun, Model: G3C, Serial Number ACB592704, 9 mm, loaded with twelve rounds of ammunition. Subsequent investigation revealed the firearm was not registered.
11. On January 14, 2025, I verbally provided Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) Special Agent Kara Klupacs with the specific information concerning the firearm, (Black Taurus Handgun, Model: G3C, 9 mm) found in Cristian De Jesus PEREZ SARGENTO'S vehicle. Agent Klupacs verbally stated that based upon her training and experience, the item described is a "firearm" as defined in Title 18 United States Code, Chapter 44 Section 921(a)(3), and was not manufactured in the State of

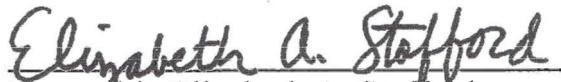
Michigan. In addition, according to information on the website of Taurus Holdings, Inc., Taurus firearms are manufactured in Brazil and in Bainbridge, Georgia.

12. Based on the above information, there is probable cause to believe that on or about January 14, 2025, in the Eastern District of Michigan, Southern Division, Cristian De Jesus PEREZ SARGENTO, knowing that he was an alien illegally and unlawfully in the United States, did knowingly possess a firearm and ammunition, that is one Taurus G3C 9mm firearm, Serial Number ACB592704, one black pistol magazine (12 round capacity) and twelve rounds of 9mm ammunition, said firearm having been shipped and transported in interstate or foreign commerce, in violation of Title 18, United States Code, Sections 922(g)(5)(A), 924(a)(8).



Brett A. Laug, Border Patrol Agent
U.S. Department of Homeland Security

Sworn to before me and signed in my presence and/or by reliable electronic means.



Honorable Elizabeth A. Stafford
United States Magistrate Judge